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AVLIS K-25 Site Operations
Waste Management Plan
Oak Ridge K-25 Site,
Oak Ridge, Tennessee

February 1992

APPROVAL FOR RELEASE

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FOR THE UNITED STATES
DEPARTMENT OF ENERGY

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K/AIS-271
Revision 0

AVLIS K-25 Site Operations Waste Management Plan
Oak Ridge K-25 Site, Oak Ridge, Tennessee

D. C. Williams

February 1992

Oak Ridge K-25 Site
Oak Ridge, Tennessee 37831
managed by
MARTIN MARIETTA ENERGY SYSTEMS, INC.
for the
U. S. DEPARTMENT OF ENERGY
under contract DE-AC05-84OR21400

Derivative Classifier: J. R. Jamison
02/92

AVLIS K-25 SITE
OPERATIONS WASTE MANAGEMENT PLAN

APPROVALS

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WASTE MANAGEMENT PLAN FOR AVLIS K-25 SITE OPERATIONS ORGANIZATION

1. INTRODUCTION

The Atomic Vapor Laser Isotope Separation (AVLIS) Division at the K-25 Site is required to develop management plans and procedures to dispose of the waste which has been generated over the past 10 years and for future operations in a manner that is consistent with Federal, State laws and DOE Orders. This plan provides guidelines for identifying, labeling, packaging and disposal of sanitary and hazardous, low-level radioactive, and mixed waste generated by AVLIS Operations.

2. SCOPE

This waste management plan provides guidelines necessary to dispose of waste materials generated by the AVLIS Operations Organization and is limited to generic waste generated by those operations. Waste generated by the AVLIS Product Conversion Demonstration (APCD) Project will be addressed in the "APCD Waste Management Plan", K/AIS-272.

3. REFERENCES

1. AVLIS K-25 Site Division Training Plan, K/AIS-270
2. APCD Waste Management Plan, K/AIS-272
3. AVLIS K-25 Site Operations Management Policy (AVLIS/OMP-003),"Waste Segregation"
4. AVLIS K-25 Site, Operations Management Policy (AVLIS/OMP-004), " Control of Sanitary Dumpster"
5. AVLIS K-25 Site Operations Management Policy (AVLIS/OMP-005), "Waste Container Labeling"
6. Code of Federal Regulations, CFR 40 Parts 260 to 299
7. K-25 Site Standard Practice Procedure-4603, "Management of Hazardous Waste in Satellite Accumulation Points and 90-Day Accumulation Areas at the K-25 Site"
8. "Spill Prevention Control and Countermeasures Plan", K/HS-338
9. K-25 Site Management Policy, "Management of Used Solvent Laden Rags/Wipes" (Ref. Appendix)
10. K-25 Site Standard Practice Procedure-341, "Waste Disposal Management"
11. Tennessee Hazardous Waste Management Regulations, Tennessee Rules, Chapter 1200-1-11.

12. K-25 Site Management Policy, Waste Oil Toxicity Characteristic Leaching Procedure (TCLP): (D018) (Ref. Appendix)

4. ACRONYMS

AAC	Assurance, Accountability, and Compliance Organization
APCD	AVLIS Product Conversion Demonstration
AWCO	Alternate Waste Certification Officer
CFR	Code of Federal Regulations
EMD	Environmental Management Division
IAD	Immediate Action Directive
LLW	Low Level Waste
MSDS	Material Safety Data Sheet
PCBs	Polychlorinated biphenyls
RCRA	Resource Conservation Recovery Act
RFD	Request For Disposal
RMSA	Radioactive Material Storage Area
SPP	Standard Practice Procedure
TCLP	Toxicity Characteristic Leaching Procedure
THWMR	Tennessee Hazardous Waste Management Regulations
TID	Tamper Indicating Device
TSCA	Toxic Substances Control Act
WCS	Waste Certification Station
WCO	Waste Certification Officer
WDC	Waste Management Division Coordinator
WMD	Waste Management Division
TSD	Treatment, Storage or Disposal Facility

5. RESPONSIBILITIES

5.1 GENERATOR

The generator of waste in the K-25 AVLIS Operations Organization is the Operations Manager and has the following responsibilities:

- With assistance from the Waste Certification Officer (WCO), the generator determines if he/she is generating hazardous waste.
- Assists the WCO in completing the Request for Disposal (RFD) to be turned into the Waste Management Division.
- With assistance from the WCO or alternate waste certification officer (AWCO), selects the proper container for the waste.
- With the assistance from the WCO/AWCO, marks the containers with the appropriate labels and pertinent waste information.

5.2 WASTE CERTIFICATION OFFICER / ALTERNATE WASTE CERTIFICATION OFFICER

The K-25 Site AVLIS Operations Organization waste certification officer, or his alternate, has the following responsibilities:

- Registers the RCRA Satellite and 90 Day Accumulation Areas with Environmental Management Department.
- Manages hazardous/mixed waste in the appropriate RCRA Satellite and/or 90 Day Accumulation Area.
- Ensures the generator in his/her area manages the waste properly and within compliance.
- Assists generator in determining if he/she is generating hazardous waste
- Fills out Request for Disposal forms, tags, labels, etc.
- Reports and manages the clean up of spilled materials.

5.3 WASTE MANAGEMENT DIVISION

The K-25 Site Waste Management Division include the following responsibilities:

- Arranges for sampling, collection, transportation, storage, treatment and disposal of hazardous waste generated throughout the Oak Ridge K-25 Site.
- Ensures that each disposal tag contains the identifying number of the corresponding (RFD).
- Verifies container numbers, labels, and tags to ensure that the identified waste is the same as that described on the (RFD).
- Transports waste to an approved TSD facility.

5.4 ENVIRONMENTAL MANAGEMENT DIVISION

The responsibilities of the K-25 Site Environmental Management Department include the following:

- Provides guidance to Waste Management Division, the waste generators, and WCO's with regard to hazardous waste regulations, orders and policies.
- Identifies and registers waste accumulation areas.
- Approves assignment of WCO's and alternates.

5.5 TECHNICAL DIVISION

The responsibilities of the Technical Division include the following:

- Provides sampling and analysis services to identify and characterize waste and waste streams.

5.6 HEALTH PHYSICS DEPARTMENT

The responsibilities of the K-25 Site Health Physics Department include the following:

- Upon request, monitors and attaches appropriate tag to waste material.
- Upon request, provides consultation on specific disposal plans.

5.7 INDUSTRIAL HYGIENE DEPARTMENT

The responsibilities of the Industrial Hygiene Department include the following:

- Establishes general health protection guidelines for the safe handling of toxic and chemical reactive waste materials.
- Upon request, provides for applicable monitoring of waste materials.
- Upon request, provides consultation on specific disposal plans.

5.8 SAFETY DEPARTMENT

The responsibilities of the K-25 Site Safety Department include the following:

- Establishes general safety guidelines for the safe handling of all waste materials.
- Upon request, provides consultation on specific disposal plans.

5.9 CRITICALITY SAFETY DEPARTMENT

The responsibilities of the K-25 Site Criticality Safety Department include the following:

- Establishes general criticality safety guidelines for disposing of fissile waste.
- Upon request, assists disposal requester in ensuring criticality safety through proper evaluation and completion of form UCN-3446A.

6. GUIDELINE

6.1 WASTE SEGREGATION

Waste will be segregated into radioactive, hazardous, mixed, carcinogenic, or non-hazardous (sanitary) categories. All segregation, packaging, container labeling, request for disposal, and transportation of waste shall be in accordance with K-25 Site SPP-341, "Waste Disposal Management." Segregation will be in accordance with AVLIS/OMP-003, "Waste Segregation." In addition, guidelines in the following sections will be utilized.

6.1.1 Hazardous and Mixed Waste

Hazardous and mixed waste will be segregated into individual waste streams and managed in approved Satellite Accumulation Stations and 90 Day Accumulation Areas. The satellite stations will be established at or near the point of generation. Mixed waste satellite stations will be located in the AVLIS contamination area or an RMSA. The AVLIS 90 Day Accumulation Area is a RMSA and is approved for both hazardous and mixed waste.

6.1.2 Waste Certification Stations

Two waste certification stations have been established for the AVLIS Operations Organization. One is located in the contamination area and the other one is located on the nonradiological side by the mechanical shop. Materials that do not meet established segregation categories are to be placed in a waste certification area for processing by the AVLIS Operations Waste Certification Officer (WCO). This person and his alternate are the only division personnel authorized to declare materials waste. The certification process includes evaluation, identification, sampling, and potential return to service. A Materials Safety Data Sheet will be attached to the material staged in the waste certification station. The WCO will evaluate whether the material can be recycled for use elsewhere in the facility on the K-25 Site, or is waste. The WCO will work with the K-25 Site Waste Management Division to properly characterize and dispose of the waste.

6.1.3 Waste Container and Contents Identification System

In order to track waste that has been segregated, the AVLIS Operations Organization has incorporated a unique waste container and contents identification system which is defined in AVLIS/OMP-005, "Waste Container Labeling." The waste container type, contents, security classification, and container tracking number are contained in the identification code. Department of Transportation (DOT) approved containers will be used.

6.2 WASTE HANDLING, PACKAGING, STORAGE, AND PROCESSING

Waste processing services are provided by the Waste Management Division. The Waste Management Division is responsible for radioactive, toxic, mixed, hazardous and nonhazardous waste for the K-25 Site. Also, Waste Management Division personnel are directly responsible for implementing environmental laws, permit requirements, Environmental Protection Agency regulations, and DOE Orders. The following guidelines will be implemented.

Handling, packaging, and storage of waste associated with AVLIS Operations Organization will be done in accordance with environmental laws, permit requirements, EPA regulations, DOE Orders, K-25 Site Policies and Procedures, and AVLIS Operations Organization Policies and Procedures. Waste will be handled, packaged and stored according to waste type, as described in Section 3.0 and according to the policy referenced in Section 6.1. Current revisions of the policies and procedures are maintained in the AVLIS K-25 Site Operations Organization office.

Waste is routinely handled by the AVLIS K-25 Site Operations Organization. Once the material has been declared waste, the Waste Certification Officer (WCO) will take actions prescribed in K-25 Site IAD-393 to coordinate disposal of the waste. If the waste has been declared hazardous mixed waste, it will be moved to the 90 Day Accumulation Area within 72 hours. The WCO will prepare a Request for Disposal (RFD) form UCN-12463 (rev. 11-89) and submit it to the Waste Management Division Coordinator (WDC) when it is placed in the 90 Day Accumulation Area. The WMD is responsible for initiating a Request for Technical Services of the Technical Division to have the waste sampled upon receipt of the RFD. The Technical Division personnel will sample the waste and place a chain of custody seal on the container. The WDC receives laboratory analyses from the Technical Services Division directly. The WDC will evaluate the analyses and RFD and direct the waste to be transferred to the appropriate treatment or storage area by the WMD. Packaging and transportation will be conducted in accordance with guidance received from K-25 Site Packaging and Transportation Organization.

Other routinely nonhazardous generated waste, as described in Section 9.0, will be segregated as it is generated and placed in appropriate containers. Filled containers will then be turned over to the AVLIS Waste Certification Officer for processing.

6.3 WASTE MINIMIZATION

Steps are being initiated to minimize waste generated in the AVLIS K-25 Site Operations Organization. These steps include the following:

1. Contamination control: this effort is being accomplished by reducing and reclaiming floor space which is now defined as a contaminated area.

2. Waste segregation: reference AVLIS K-25 Site Operations Management Policy,(AVLIS/OMP-003) "Waste Segregation".

6.4 CONTAMINATION CONTROL

Contamination control practices and training are designed to provide safe, efficient working conditions in compliance with applicable DOE and Energy Systems requirements. K-25 Site requirements will be utilized for the AVLIS K-25 Site Operations Organization. Contamination control practices and training will control the spread of contaminated materials from work areas and reduce the quantity of LLW generated by the AVLIS K-25 Site Operations Organization.

7. DIVISIONAL WASTE MANAGEMENT STRUCTURE

The structure of the AVLIS K-25 Site Operations Organization is shown in Figure 1. The AVLIS Assurances, Accountability and Compliance (AAC) Organization, and specifically, the Materials Management Group has responsibility for the AVLIS divisional waste management program, and manages the 90-Day Accumulation and Satellite Areas.

8. APPROVED HAZARDOUS CONTAINERS

The following is a list of containers and drums which are acquired through the K-25 Site and are approved (DOT) shipping containers to be used for AVLIS waste operations:

- 55 gallon drums with DOT 17E,17C or 17H stamped on the bottom
- A B-25 steel container which is 4 ft x 4 ft x 6 ft and has an identification number stamped on it
- A 5 gallon steel bucket with DOT 17 or 6C stamped on the bottom
- A 30 gallon drum with DOT 17 or 17C stamped on the bottom

9. TYPES OF WASTE GENERATED

The list of typical wastes generated by AVLIS Operations in Table 1 can be classified as either sanitary, low-level radioactive, hazardous, or mixed waste. This will be determined by the WCO's direct knowledge, the Health Physics Department and/or analysis conducted by the Technical Division. The following is a description of the identified waste streams.

9.1 RADIOACTIVE WASTE

9.1.1 Low-Level Radioactive Contaminated Waste

Low-level radioactive contaminated waste (LLW) generated by AVLIS Operation will be contaminated with uranium. Uranium present in the facility is limited to either depleted or natural metals and/or oxides,chlorides, or fluorides.

FIGURE 1

AVLIS K-25 Site Operations Organization

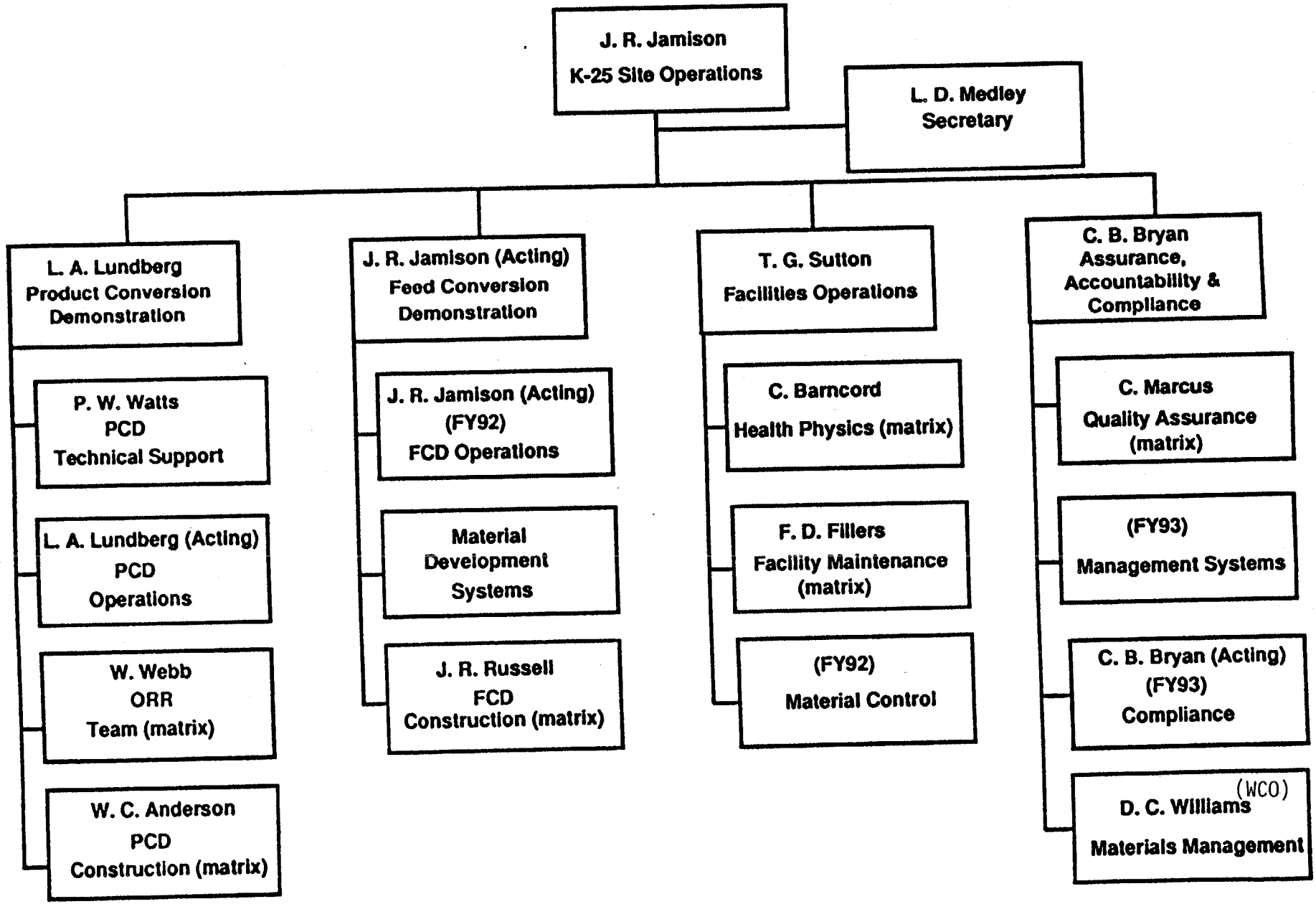

TABLE 1

TYPICAL WASTE GENERATED BY AVLIS OPERATIONS			
	FY92	FY93	FY94
Rubber,Plastic,Styrofoam,Foamrubber (cu.ft./yr.)	96	150	250
Wood,Paper,Cloth & Leather Gloves, Cardboard (cu. ft./yr.)	96	200	300
Ferrous Metal (cu. ft./yr.)	50	40	30
Non-Ferrous Metal (cu. ft./yr.)	30	20	10
Aerosol Spray Cans (cu.ft./yr.)	10	10	10
Glass (gal./yr.)	55	55	55
Graphite & Ceramic (cu.ft./yr.)	10	5	5
Rain & Condensate Water (gal./yr.)	275	275	275
Used Oil (D018) (gal./yr.)	55	55	55
Batteries (D002 & D009) (gal./yr.)	35	25	15
Floor Sweepings (gal./yr.)	275	275	275
Lead Solder (D008) (gal./yr.)	30	20	10
Silver Solder (D011) (gal./yr.)	30	20	10
Brass (D008) (gal./yr.)	110	55	55
Grit Blast Material (silicon) (Potential D011) (gal./yr)	55	55	55
Oily Absorbent (D018) (gal./yr.)	20	20	20
Rags & Wipes contaminated with Oil, Freon, Acetone and/or 1,1,1 Tricholorethane (F001, F002, D018) (gal./yr.)	55	55	55
Insulated Wire (gal./yr.)	110	55	55
PCBs (gal./yr.)	20	20	20
Asbestos (gal./yr.)	55	55	55
Fiberfax (gal./yr.)	55	55	55
Nextel Fiber (gal./yr.)	55	55	55
Mercury and Mercury Switches (D009) (gal./yr.)	5	0	0

9.1.2 Equipment Disposal

Equipment/components removed from service due to replacement or modification and which are slated for disposal will be managed as LLW, with the exception of that equipment containing brass, mercury, silver solder, lead, lead solder, PCBs, asbestos, or other RCRA materials will be managed as mixed waste.

9.1.3 Protective Clothing and Tools

LLW consisting of discarded protective clothing and tools that have become contaminated may be generated. These items will be surveyed and declared non-radioactive waste and be handled as sanitary waste whenever possible in order to reduce the volume of LLW generated.

9.1.4 Segregation/Collection Stations

Waste segregation/collection stations are established for LLW for the AVLIS Operations. Segregation will provide a means of establishing a generation rate of each waste stream and is necessary for characterization of waste for disposal.

9.2 NON-HAZARDOUS WASTE (SANITARY)

The sanitary waste generated by AVLIS Operations is administratively controlled, as outlined in the AVLIS K-25 Site Operations Management Policy (AVLIS/OMP-003) "Waste Segregation" for acceptable and non-acceptable sanitary waste. The sanitary dumpster is controlled by locking the side door of the dumpster and the top lids are secured with a Tamper Indicating Device (TID). It will be inspected daily and a log will be kept per AVLIS/OMP-005.

9.3 HAZARDOUS WASTE

The identification and listing of hazardous waste are contained in the Code of Federal Regulations, CFR 40 Part 261, and in the Tennessee Hazardous Waste Management Regulations (THWMR), Tennessee Rules, Chapter 1200-1-11. A waste is managed as hazardous if it meets any of the following:

1. It is listed in the Code of Federal Regulations (CFR), 261, subpart D- list of hazardous waste, under the requirements of RCRA and/or THWMR.

2. It exhibits any one of the four following characteristics; toxicity, ignitability, corrosivity, or reactivity. Specific definitions of each of these characteristics are contained in CFR 40, 261.

3. It is a mixture containing a listed hazardous waste and a non-hazardous solid waste.

4. It is a residue from the treatment, storage, or disposal of a listed waste, as defined in 40 CFR 261.3.

9.3.1 Accumulation Areas

Hazardous waste generated will be accumulated and managed in approved registered satellite accumulation areas in accordance with K-25 Site Immediate Action Directive (IAD) No. 393, "Satellite and 90 Day Accumulation Area Management." One satellite station will be established for each waste stream. Once the satellite accumulation container is filled, the waste will be transferred to the 90-Day Accumulation Area within 72 hours. Each waste stream will be analyzed by the K-25 Site Technical Division to confirm the hazardous nature of the waste prior to shipment. Initiation of the sampling request is the responsibility of the K-25 Site Waste Management Division.

9.3.2 Special Waste Streams

Oil is generated by the AVLIS K-25 Site Operations Organization, but is not specifically regulated under RCRA. This oil will be managed as D018 (benzene contaminated) until the analysis has confirmed that the oil contains no benzene.

Similarly, respirator cartridges will be managed as hazardous due to the potential of containing D007 (chromium).

9.3.3 Solvent Contaminated Materials

Oil and RCRA listed solvent contaminated materials, including but not limited to rags, wipes, zorball, filters and gloves that are not contaminated with uranium will be managed as hazardous waste in accordance with K-25 Site Management Policy, "Management of Used Solvent Laden Rags/Wipes."

9.3.4 Polychlorinated Biphenyls

The AVLIS K-25 Site Operations Organization generates small quantities of Polychlorinated Biphenyls, such as capacitors, light fixture ballast, etc. These generated waste will be handled in a manner appropriate with established K-25 Site policies, Procedures, DOE Orders, and all federal/state laws.

9.4 MIXED WASTE

Mixed waste is waste which is radioactively contaminated hazardous waste. The potential exists for certain AVLIS generated hazardous waste streams to be radioactively contaminated. Mixed waste will be managed in accordance with both hazardous and radioactive waste requirements. Prior to shipment, the waste will be analyzed by the K-25 Technical Division to confirm characterization. The K-25 Site Waste Management Division has the responsibility of initiating the sample request. Mixed waste will be accumulated and managed in approved and registered Satellite and 90 Day Accumulation Areas in accordance with SPP-4603, "Management of Hazardous Waste in Satellite Accumulation Points and 90-Day Accumulation Areas at the K-25 Site. Satellite stations will be established for each mixed waste stream and be located in an RMSA. Once the satellite accumulation container is filled, the waste will be transferred to the AVLIS 90-Day Accumulation Area within 72 hours.

9.4.1 Waste Oil

The AVLIS K-25 Site Operations Organization will generate radioactively contaminated waste oil. This waste oil will be managed as mixed (D018) benzene contaminated in accordance with Energy Systems Central Environmental Compliance direction (reference internal memorandum from K.L. Brady dated October 25, 1991 on the subject of Waste Oil TCLP Code, appended).

9.4.2 RCRA Listed Solvent Materials

Oil and RCRA - listed solvent contaminated materials, including but not limited to rags, wipes, zorball, filters, and gloves that are radioactively contaminated will be managed as mixed waste in accordance with K-25 Site Management Policy, "Management of Used Solvent Laden Rags and Wipes."

9.4.3 Contaminated Process Equipment

Any radioactively contaminated process equipment which contains brass, silver solder, mercury, chromium, and lead solder, or other RCRA materials will be managed as mixed waste, until sample analysis confirms no radioactivity contamination.

9.5 SPILLS

Response to spills will be consistent with guidelines contained in the Spill Prevention Control and Countermeasures Plan for the Oak Ridge K-25 Site (K/HS-338). In the event of a spill, the K-25 Site Plant Shift Supertendent will be notified.

10. TRAINING

K-25 Site Immediate Action Directive (IAD) N0. 393, "Satellite and 90 Day Accumulation Area Management" contains training requirements for waste generators and Waste Certification Officers (WCO's). These training requirements will be incorporated into the AVLIS Division training Plan K/AIS-270. Compliance with the training requirements will be monitored by AVLIS Division Training Officer and reviewed by line management. Provision for appropriate training will allow waste to be minimized and to be managed in a safe, effective, and compliant manner.

TABLE 1

TYPICAL WASTE GENERATED BY AVLIS OPERATIONS			
	FY92	FY93	FY94
Rubber,Plastic,Styrofoam,Foamrubber (cu.ft./yr.)	96	150	250
Wood,Paper,Cloth & Leather Gloves, Cardboard (cu. ft./yr.)	96	200	300
Ferrous Metal (cu. ft./yr.)	50	40	30
Non-Ferrous Metal (cu. ft./yr.)	30	20	10
Aerosol Spray Cans (cu.ft./yr.)	10	10	10
Glass (gal./yr.)	55	55	55
Graphite & Ceramic (cu.ft./yr.)	10	5	5
Rain & Condensate Water (gal./yr.)	275	275	275
Used Oil (D018) (gal./yr.)	55	55	55
Batteries (D002 & D009) (gal./yr.)	35	25	15
Floor Sweepings (gal./yr.)	275	275	275
Lead Solder (D008) (gal./yr.)	30	20	10
Silver Solder (D011) (gal./yr.)	30	20	10
Brass (D008) (gal./yr.)	110	55	55
Grit Blast Material (silicon) (Potential D011) (gal./yr)	55	55	55
Oily Absorbent (D018) (gal./yr.)	20	20	20
Rags & Wipes contaminated with Oil, Freon, Acetone and/or 1,1,1 Tricholorethane (F001, F002, D018) (gal./yr.)	55	55	55
Insulated Wire (gal./yr.)	110	55	55
PCBs (gal./yr.)	20	20	20
Asbestos (gal./yr.)	55	55	55
Fiberfax (gal./yr.)	55	55	55
Nextel Fiber (gal./yr.)	55	55	55
Mercury and Mercury Switches (D009) (gal./yr.)	5	0	0

APPENDIX

MARTIN MARIETTA

Internal Correspondence

MARTIN MARIETTA ENERGY SYSTEMS, INC.

October 25, 1991

Distribution

Waste Oil TCLP Code

Waste oil, waste oil contaminated material (including spill cleanup residues),and oil contaminated rags and wipes are managed as hazardous waste at the Oak Ridge K-25 Site. This is because of the detection limits for certain toxicity characteristic leaching procedure (TCLP) organic constituents above the regulatory limits found in 40 CFR 261.24.

Although none of the organic constituents may be present in waste oil, benzene is as likely as other constituents to be present in the waste oil. To ensure consistency among the Martin Marietta Energy Systems, Inc., sites, the central Environmental Compliance organization has directed that waste oil generated that is not being recycled or burned for energy recovery should be "coded" D018 for benzene.

If you have any questions or require additional information, please contact R. D. Gibby at 576-8396.

K. L. Brady, K-303-8, MS-7308 (4-9200)

KLB:RDG:rtk

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Policy Notebook

MARTIN MARIETTA

Internal Correspondence

MARTIN MARIETTA ENERGY SYSTEMS, INC.

June 28, 1991

Distribution

K-25 SITE MANAGEMENT POLICY

Subject: Management of Used Solvent Laden Rags/Wipes

It is the policy of the Oak Ridge K-25 Site to manage used solvent laden rags/wipes in accordance with all federal, state, and local regulations; Department of Energy (DOE) orders; and Martin Marietta Energy Systems, Inc., policies and procedures. Many of the solvents used at the K-25 Site, when they become waste, are hazardous waste. Any rags/wipes containing these same solvents are also hazardous waste, and, with one exception, shall be managed as hazardous waste.

Used solvent laden rags/wipes, without visible free liquids, may be laundered and returned to use. Used solvent laden rags/wipes with visible free liquids, or that are otherwise determined unsuitable for laundering, are considered hazardous waste and are subject to all of the management requirements for hazardous waste, including containerization, labeling of containers, and storage of the wastes.

This policy is not intended to change the normal waste acceptance or waste handling policies currently in existence at the K-25 Site. This policy is meant to clarify that all used solvent laden rags/wipes that are determined to be unacceptable for laundering are to be managed as hazardous waste.

L. E. Hall

L. E. Hall, K-1001, MS 7134 (4-7930)

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